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ATTORNEYS FOR DEFENDANTS
 TRIANGLE CROSS RANCH, LLC
 GERALD E. SCHNEIDER; MICHAEELEN P. SCHNEIDER
 MATHEW SCHNEIDER; MARK SCHNEIDER and THOMAS GEORGE

IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF WYOMING

CARLIE SHERMAN, ANNA GOZUN,
AMANDA NASH, and **JOHN DOE** on behalf of
 themselves and all similarly situated persons,

PLAINTIFFS,

v.

TRINITY TEEN SOLUTIONS, INC., a
 Wyoming corporation; **TRIANGLE CROSS**
RANCH, LLC, a Wyoming limited liability
 corporation; **MONKS OF THE MOST**
BLESSED VIRGIN MARY OF MOUNT
CARMEL, d/b/a MYSTIC MONK COFFEE, a
 Wyoming corporation; **GERALD E.**
SCHNEIDER; MICHAEELEN P.
SCHNEIDER; ANGELA C. WOODWARD;
JERRY D. WOODWARD; DANIEL
SCHNEIDER; MATHEW SCHNEIDER;
MARK SCHNEIDER; KARA WOODWARD;
KYLE WOODWARD; THOMAS GEORGE;
JUDITH D. JEFFERIS; DALLY-UP, LLC, a
 Wyoming limited liability corporation; **ROCK**
CREEK RANCH, INC., a Delaware corporation;
DIOCESE OF CHEYENNE, a Wyoming
 corporation; and the **SOCIETY OF OUR LADY**
OF THE MOST HOLY TRINITY, a Texas
 corporation; and **NEW MOUNT CARMEL**
FOUNDATION, INC., a Wyoming corporation,

DEFENDANTS.

Civil Case No. 20-CV-00215-SWS

**DEFENDANTS TRIANGLE CROSS RANCH, LLC, GERALD E. SCHNEIDER,
MICHAEELEN P. SCHNEIDER, MATTHEW SCHNEIDER, MARK SCHNEIDER, AND
THOMAS GEORGE’S MOTION TO DISMISS AMENDED COMPLAINT**

Defendants Triangle Cross Ranch, LLC, Gerald E. Schneider, Michaelleen P. Schneider, Matthew Schneider, Mark Schneider, and Thomas George (“TCR Defendants”), through their attorneys White and Steele, P.C., hereby move under Fed. R. Civ. P. 12(b)(6) to dismiss all claims with prejudice against the TCR Defendants for failure to state a claim upon which relief may be granted. The TCR Defendants have submitted a written brief in support of this Motion, incorporated here by reference. TCR Defendants move for dismissal based on the following grounds:

1. Plaintiffs’ RICO claim is untimely (Count 4);
2. Plaintiffs cannot establish RICO standing (Count 4);
3. Plaintiffs fail to state the remaining substantive RICO elements of (1) conduct (2) of an enterprise (3) through a pattern (4) of racketeering activity (Count 4);
4. Plaintiffs fail to state the required predicate violations pursuant to the Racketeer Influenced and Corrupt Organizations Act (RICO) (Count 4);
5. Plaintiffs fail to state a cognizable labor or services theory pursuant to the Trafficking Victims Protection Act (TVPA) (Counts 1-3);
6. Plaintiffs fail to state the required element of compulsion under the TVPA (Counts 1-3); and,
7. Plaintiffs fail to state knowing violations of the TVPA (Counts 1-3).

WHEREFORE Defendants respectfully ask the Court to dismiss the plaintiffs’ claims against the TCR Defendants, with prejudice.

Dated: March 26, 2021

WHITE & STEELE, P.C.

/s/ John C. Matthews

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THOMAS GEORGE

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed on March 26, 2021, with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all attorneys of record.

/s/ John C. Matthews

For White and Steele